

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

REGINA DAVIS,)	
)	
Plaintiff,)	
)	
v.)	Civil Action: 6:23cv00014
)	
CITY OF LYNCHBURG,)	
RYAN ZUIDEMA, et al.)	
)	
Defendants.)	

MOTION TO DISMISS

Defendants by counsel, move pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure to dismiss the Complaint and in support thereof state that the Complaint fails to state a claim upon which relief can be granted as more fully set forth in Defendants' Memorandum in Support of Motion to Dismiss.

WHEREFORE, Defendants respectfully move the Court to dismiss the Complaint with prejudice.

CITY OF LYNCHBURG
RYAN ZUIDEMA
S.H. GIFFORD
M. PUPILLO

By /s/ Jim H. Guynn, Jr.
Jim H. Guynn, Jr. (VSB # 22299)
Matthew J. Schmitt (VSB# 96513)
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Attorney for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of May, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system.

/s/ Jim H. Guynn, Jr.
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